

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

QWEST COMMUNICATIONS
INTERNATIONAL, INC.,

Plaintiff,

v.

CONQWEST, INC.,

Defendant.

Civil Action No. 04-cv-11878 RCL

DECLARATION OF CHRISTINE SEARLS

1. 1. My name is Christine Searls. I am a member of the Bar of the State of Colorado. I have personal knowledge of the matters stated in this declaration and would testify truthfully to them if called upon to do so.

2. I am in-house counsel to plaintiff Qwest Communications International, Inc. (“Qwest”).

3. On Monday, January 30, 2006, Qwest produced approximately 14,000 pages of documents on compact disc.

4. Many of these documents included Qwest’s confidential business information, including customer lists, business plans, pricing information, financial data, and other highly sensitive data.

5. Qwest produced this information in reliance on defendant ConQwest, Inc.’s (“ConQwest’s”) express agreement to the terms of a protective order.

6. In accordance with this stipulated protective order, Qwest designated certain documents “Confidential” and “Highly Confidential – Attorneys’ Eyes Only.”

7. Qwest would suffer immediate and irreparable damage if this sensitive and confidential information were allowed to become public. The exposure of Qwest’s trade secrets,

financial information, pricing policies, and business plans would place Qwest at a competitive disadvantage.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed at Denver, Colorado, this third day of February, 2006.

/s/ Christine Searls
Christine Searls

Document in ProLaw